

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,

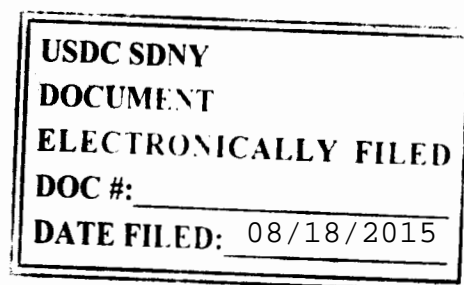
Plaintiff,

v.

WELLS ENTERPRISES, INC.,

Defendant.

Case No.: 1:14-cv-02223-NRB-RLE



WELLS ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,

Counterclaim Defendant.

STIPULATION TO EXTEND TIME

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever (“Unilever”), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. (“Defendant”) (hereinafter collectively, the “Parties”), stipulate and agree that all deadlines set forth in the Court’s July 20, 2015 order (the “Order”) shall be extended by 30 days, as follows:

Event	Current Deadline	Proposed Deadline
Initial expert reports due	August 20, 2015	September 21, 2015
Rebuttal expert reports due	September 24, 2015	October 26, 2015
Close of all fact discovery	October 28, 2015	November 27, 2015

Event	Current Deadline	Proposed Deadline
Close of all expert discovery	November 16, 2015	December 16, 2015
Last day to file case dispositive motions	November 30, 2015	December 30, 2015

This stipulation is the parties' third request to extend the deadlines set forth in the case. Your Honor granted the parties' previous requests to extend the case deadlines. The requested extension is not being sought for the purpose of delay, but so that the parties can finalize the terms in their settlement agreement. Specifically, while the parties have exchanged draft versions of a proposed settlement agreement, the parties require additional time to finalize a few of the terms in the agreement. Accordingly, the parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's July 20, 2015 order be continued as set forth above. The Parties submit the enclosed proposed Revised Scheduling Order.


DUANE MORRIS LLP

Gregory P. Gulia

Vanessa C. Hew

1540 Broadway

New York, New York 10036-4086

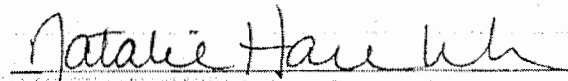
Telephone: (212) 692-1000

Facsimile: (212) 692-1020

E-mails: gpgulia@duanemorris.com

vchew@duanemorris.com

*Attorneys for Plaintiff-Counterclaim Defendant
Conopco, Inc. d/b/a Unilever*


Natalie Hanlon-Leh (*pro hac vice*)

Wilmer Cutler Pickering Hale and Dorr LLP

1255 17th Street, Suite 1660

Denver, CO 80202

E-mail: natalie.hanlonleh@wilmerhale.com

Edward Rosenthal

Beth Ilana Goldman

Nicole Bergstrom

Frankfurt Kurnit Klein & Selz PC

488 Madison Avenue

New York, NY 10022

Telephone: (212)-705-4817

Fax: (212)-593-9175

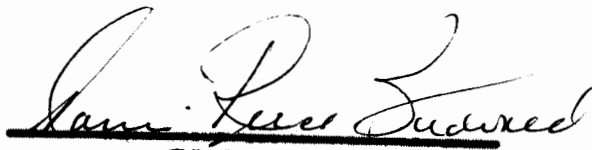
E-mails: erosenthal@fkks.com

bgoldman@fkks.com

nbergstrom@fkks.com

*Attorneys for Defendant-Counterclaim Plaintiff
Wells Enterprises, Inc.*

SO ORDERED:


U.S.D.J.
8/17/15 *rm*